

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RONALD MORGAN, as attorney-in-fact
for HELGA NEUSS,

Plaintiff,

vs.

SEABOURN CRUISE LINE LIMITED,

Defendant.

CASE NO: 2:20-cv-00770-BJR

**STIPULATION AND ORDER TO ALLOW
EXPERT DEPOSITIONS AFTER
EXCHANGE OF EXPERT WITNESS
REBUTTAL REPORTS AND
DESIGNATIONS**

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1 Defendant SEABOURN CRUISE LINE, LTD. and Plaintiff RONALD MORGAN, as
2 attorney-in-fact for HELGA NEUSS, through their respective counsel of record, collectively
3 (the “Parties”), hereby submit this joint Stipulation to allow expert depositions in the three
4 weeks following the date for rebuttal expert designations and reports. expert designations, the
5 discovery cutoff and the dispositive motion cutoff by approximately one month. The Parties
6 assert that there is good cause to amend the Order Setting Trial Dates and Related Dates (Dkt.
13). The request is based on the following:

7 1. This action seeks damages resulting from the alleged personal injuries to
8 Plaintiff Helga Neuss, who was a passenger aboard the SEABOURN QUEST cruise vessel
9 when she allegedly suffered a stroke while on board. Plaintiff alleges that Seabourn was
10 negligent in conducting the medical evacuation of Ms. Neuss, contributing to her injuries. The
11 parties timely designated experts on February 8, 2021, which included neurologists, cruise ship
12 physicians, and life care planners. Rebuttal expert designations and reports are due on March
13 10, 2021.

14 2. The parties wish to exchange and review rebuttal reports and designations
15 prior to expert witness depositions, to allow for complete questioning of each expert.
16 Accordingly it is requested that expert witness depositions may take place up to and including
17 March 26, 2021. This Court’s order set the discovery cutoff date as March 10, 2021 (the same
18 day as expert counter designation and rebuttal reports are due), so the requested extension
19 would allow the parties approximately 2 ½ weeks after those experts and reports are disclosed
20 to complete expert depositions.

21 3. The requested expert deposition window will not interfere with any other
22 dates set by the court. All other dates, including trial, will remain the same.

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1 IT IS SO STIPULATED.

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3 **FOR PLAINTIFFS**

4 Date: February 24, 2021

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16
17 **FOR DEFENDANT**

18 Date: February 24, 2021

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ORDER

Having reviewed the stipulation of the parties (Dkt. No. 16), the Court ORDERS that expert witness depositions in this matter may take place up to and including March 26, 2021.

Dated this 24th day of February 2021.



Barbara Jacobs Rothstein
U.S. District Court Judge